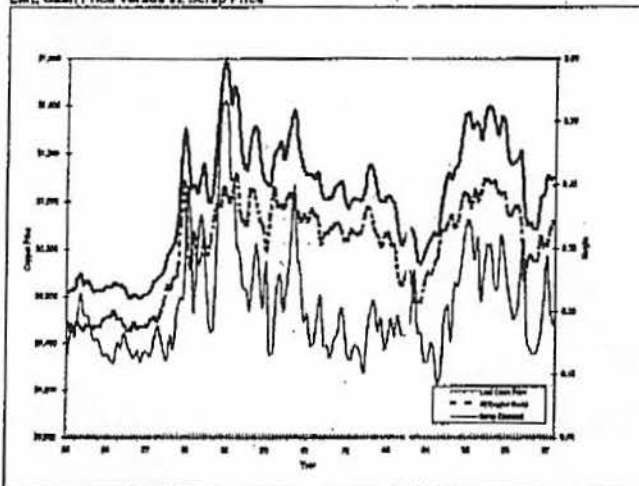


Exhibit A

To be afforded liability relief, a recycler must be able to demonstrate under Section 127(c)(2) that a market existed for the recyclable material. Evidence of a market can include, but is not limited to, a third party published price (including a negative price), a market with more than one buyer or seller for which there is a documentable price, and a history of trade in the recyclable material.

Copper is freely traded on commodity future exchanges located in London (the London Metal Exchange) and New York City (Commodity Exchange, Inc. i.e., Comex), and is therefore subject to periods of price volatility unrelated to supply-and-demand fundamentals. Additionally, domestic producers maintain a published list of prices for cathodes which change with market conditions. Domestic scrap prices are usually keyed to Comex prices. As evidence, LME, Comex, and scrap prices have exhibited a high degree of correlation over time. (see chart)

LME Cash Price Versus #2 Scrap Price



Source: Metal Bulletin; London Metals Exchange.

According to the U.S. Geological Survey (USGS), while copper scrap prices correlate to the price of refined copper, the price paid for scrap at each level of processing must be sufficiently discounted to allow for all subsequent processing costs. Thus, a scrap collector who must perform such functions as sorting, shipping, chopping, baling, etc. will pay less for scrap than does the consumer of the scrap³.

The history of trade in scrap has been memorialized by the American Metal Market (AMM). AMM has tracked the price of scrap for decades. Attachment I is a chart of selected copper scrap prices dating from 1970. This chart tracks data collected by AMM and can be found in the USGS Statistical Compendium on Copper (see Other Sources).

Market fluctuations and prices are tracked not only by AMM, but the USGS as well. USGS traditionally includes a discussion on copper scrap prices in its publications on metals recycling. The following is an excerpt from a 1997 USGS Report. A copy of the entire document can be found in Attachment II:

"Copper scrap prices trended upward during the first half of 1997, following the upward trend in refined copper prices. In the first half of the year, the New York average buying price for No. 1 scrap at brass mills, and No. 2 scrap at refiners, averaged \$1.08 and \$.090 per pound, respectively. In July, scrap prices followed refined prices in a downward spiral; the No.1 and No.2 scrap prices averaged \$0.91 and \$0.74, respectively, during the second half of the year. The margin between refined copper and No.2 scrap averaged \$0.26 per pound during the first half of the year and declined with lower prices, averaging \$0.24 per pound during the second half of the year. In December, when No.2 scrap averaged only \$0.62 per pound, the margin had shrunk to \$0.21 per pound."

"Like the secondary aluminum industry, these producers [the secondary copper industry] buy the scrap they recycle on the open market. In addition to using scrap generated in their own downstream productions, The secondary copper industry is concentrated in Georgia, South Carolina, Illinois, and Missouri."

Source: U.S. EPA Sector Notebooks, Profile of the Nonferrous Metals Industry

Exhibit B



FIRST IN PEOPLE — QUALITY — SERVICE

P.O. Box 67 • Hartford, IL 62048
618-254-4381 • 800-444-5564

March 10, 2000

Mr. Jerry Simms
Atlas Metal & Iron
P.O. Box 5428
Denver, CO 80217

Re: Superfund Recycling Equity Act

Dear Mr. Simms:

Chemetco believes that it is currently in compliance with the substantive provisions of any Federal, State, or local environmental law or regulation, or compliance order or decree issued pursuant thereto, applicable to the handling, processing, reclamation or other management activities associated with recyclable materials. Chemetco recycles all the materials sent to it, does not burn the materials for fuel or energy recovery, does not add hazardous waste to the recyclable materials and manages and handles the recyclable materials in accordance with customary industry practices. Chemetco sells the products it derives from the recycled materials through established markets.

Very truly yours,
CHEMETCO, INC.

By: Heather Young
Environmental Manager
CHEMETCO, INC.

Cc: George von Stamwitz, Armstrong & Teasdale
Joe Leahy, Chemetco Chicago Warehouse

ATLAS 003280

ATLAS



METAL & IRON CORP

P.O. BOX 5428 DENVER, COLORADO 80217
TELEPHONE: (303) 825-7166
FACSIMILE (303) 825-4951

March 1, 2001

Chemetco, Inc.
ATTN: Environmental Manager
P. O. Box 8
Hartford, IL 62048

**Re: Regulatory Compliance Information Request
Superfund Recycling Equity Act**

To Whom This May Concern:

As you may know, on November 29, 1999, President Clinton signed into law the Superfund Recycling Equity Act (Public Law 106-113). This law clarifies Superfund to state that recycling is not disposal, and shipping for recycling is not arranging for disposal.

Under the new law, a scrap processor must exercise "associated reasonable care" to determine that the consuming facility where the material was sent, handled, processed, reclaimed, or otherwise managed by another person (referred to as the "consuming facility") was in compliance with substantive (not procedural or administrative) provisions of any Federal, State, or local environmental law or regulation, or compliance order or decree issued pursuant thereto, applicable to the handling, processing, reclamation, storage, or other management activities associated with the recyclable material.

To satisfy the requirements of this law, Atlas Metal & Iron Corp. is seeking the following information as it relates to scrap metal delivered to your facility named below for recycling:

Chemetco, Inc.
Rte. 3 & Chemetco Lane
Hartford, IL 62048

Compliance Information and Questionnaire

#1.) Is your facility in compliance with substantive provisions of the following Federal, State, and/or local environmental statutes, laws, regulations, and permits that are applicable to the handling, processing, reclamation, storage, etc. of scrap metal?

<u>Statute/Permit</u>	<u>Compliant? (Y/N)</u>
CWA (Clean Water Act)	_____
CAA (Clean Air Act)	_____
EPCRA (Emergency Planning and Community Right To Know)	_____
NPDES (National Pollutant Discharge Elimination Act)	_____
RCRA (Resource Conservation and Recovery Act)	_____
TRI (Toxic Release Inventory)	_____
Used Oil	_____
Other Requirements Not Listed	_____

#2.) If, in Question #1, you answered no to any of the above, is your facility subject to any Notice of Violation (NOI), Compliance Order, or Decree? If so, please list below:

<u>Notice, Order or Decree</u>	<u>Date</u>	<u>Statutory Violation</u>
1.) _____	_____	_____
2. _____	_____	_____
3.) _____	_____	_____

#3.) If your facility is subject to a Notice of Violation, Compliance Order, or Decree, is that facility meeting the conditions prescribed in the named action? If not, please explain fully below as to why not:

#4.) Acknowledgment of the appropriate environmental officer, general manager, or other company representative with knowledge of the environmental issues note:

"I acknowledge that the information submitted was properly gathered and evaluated and to the best of my knowledge and belief is true, accurate, and complete".

BY: _____
Print Name Title Date

Signature

Page 3.

Thank you very much for your attention and assistance to this request. As this information is critical in demonstrating our company's "reasonable care" due diligence, please provide the necessary statement or documentation to us by 20 calendar days after receipt of this letter either to our address at the top of our letterhead, or if you prefer, via Email to jsimms@atlasmetal.com.

Very truly yours,

ATLAS METAL & IRON CORP.

Jerry Simms

JS:dp

Exhibit C

Superfund Recycling Equity Act

Consuming Facility Compliance Checklist

Under the new law (Pub. Law 106-113), a scrap processor is required to exercise reasonable care to determine that the facility where the recyclable material was handled, processed, reclaimed, or otherwise managed by another person (referred to as a "consuming facility") was in compliance with substantive (not procedural or administrative) provisions of any Federal, State, or local environmental law or regulation, or compliance order or decree issued pursuant thereto, applicable to the handling, processing, reclamation, storage, or other management activities associated with recyclable material.

To satisfy the requirements of this law, Atlas Metal & Iron Corp. Inc. is seeking the following information as it relates to scrap (paper, plastic, glass, textiles, rubber, metal, whole batteries) delivered to your facility for recycling:

Facility Information

A. Company Name: Chemetto, Inc.
 B. Physical Location: 3576 Chemetto Ln, Hartford, IL 62048
 C. Primary SIC or NAICS: 3341
 D. Contact Person: Heather Young
 E. Telephone #: 618/234-4381

In regards to CURRENT INCOMING SCRAP, Chemetto believes that it is in compliance with applicable laws and regulations.

Compliance Information

Is your facility in compliance with substantive provisions of federal, state and/or local environmental laws and regulations that are applicable to the handling, processing, reclamation, storage, etc. of the recyclable material described above? Please use the following checklist to record your response. Substantive provisions relevant to this request may include, but are not limited to the following environmental, legal or regulatory requirements based on SIC code, material handled, and specific activities at the facility.

Statute	Specific Provision	Is your Facility in compliance with this regulatory requirement?			If no, is your facility subject to a notice of violation, compliance order or decree and Meeting the conditions prescribed in the action?		If no, please explain: (if additional space is needed, attach explanation)
		Yes	No	NA	Yes	No	
CWA	Industrial NPDES or Pretreatment Permit	X	Current			X	Historical Release
RCRA	Hazardous Waste Regulations	X	Current			X	Historical Units
	Solid Waste Regulations	X					
	Used Oil Standards	X					
	Battery Reclamation Rules	X					
	Corrective Cleanup Action	X					
CAA	Air Permit	X	Currently operating under a Consent Order w/ USEPA				
PCRA	Community Right to Know (Inventory Reporting 311/312)	X					
	TRI Reporting	X					
Others requirements, including state or local requirements not listed:							

* Information in the table related to violations are HISTORICAL issues and are not related to current operations or practices regarding incoming scrap. I acknowledge that the information submitted was properly gathered and evaluated and to the best of my knowledge and belief, is true, accurate, and complete.

Signature: Heather Young

Date: 5-1-01